

EXHIBIT E

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May 8, 2012

VIA ELECTRONIC MAIL

Robert A. Mittelstaedt, Esq.
Jones Day
555 California Street
26th Floor
San Francisco, CA 94104

**Re: *In re: High-Tech Employee Antitrust Litigation,*
Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Mr. Mittelstaedt:

I write on behalf of Plaintiffs in the above-captioned matter in response to Adobe Systems Inc.'s ("Adobe") production of data with the file names:

FY2001_HighlyConfidentialAEO to FY2012_HighlyConfidentialAEO.

First, please let us know by tomorrow, May 9, 2012, whether Adobe has finished producing data responsive to Plaintiffs' requests, and if not, by what date Adobe's data production will be complete. Please note that Exhibit 1 to this letter lists categories of data that have not been produced and that were included in Plaintiffs' requests for production. Of particular note is that Adobe has not produced hiring and recruiting data, which was requested by Plaintiffs and which Adobe agreed to produce. Additionally, please produce the individual encrypted IDs that Defendants agreed to provide. Given the fast-approaching class certification deadlines, it is imperative that Adobe produce all relevant data immediately.

Second, Exhibit 1 contains a list of questions concerning Adobe's data. Given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address these questions would be through a teleconference involving Plaintiffs' counsel, a staff member of Plaintiffs' consulting expert, and a representative of Adobe who is knowledgeable about the data produced by Adobe. Please propose a time this week or next week when Adobe will make

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available a person knowledgeable about the data produced in this litigation for such a teleconference.

Thank you, and please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel J. Walker", with a long horizontal flourish extending to the right.

Daniel J. Walker

cc: Dean Harvey

Enclosure

Exhibit 1 to May 8, 2012 Walker Letter

I. Employee Data Questions & Issues Relating to FY2001_HighlyConfidentialAEO to FY2012_HighlyConfidentialAEO.

A. Please explain what the following fields represent:

1. Span Group
2. Seniority Date
3. Sabbatical Data
4. NCG Flag
5. Current Job Start Date
6. Current Job End Date
7. Current Global Job Start Date
8. Current Global job End Date
9. Organization Unit Start Date
10. Organization Unit End Date
11. Manager Employee ID
12. Mgmt Level
13. Mgmt Level Group
14. Company Name
15. EEO Category ID

B. What are the components of the field “Compensation Amount in USD”? Does compensation include only the base salary or does it include other components such as bonuses? Please explain.

C. Close to 70% of the observations have missing values for “People Manage Date.”

a. Please explain what this field represents.

b. For a given employee, does a missing value for the field “People Manager Date” mean that the employee does not manage employees? If no, what do the missing values stand for?

D. Define each of the values found in the field "Personnel Area Name":

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1. United States – OM
 2. United States Federal
- E. Define each of the values found in the field "Hire Source":
1. Acquisition
 2. CONVERSION ONLY
 3. CW to Regular
 4. Original Hire Record
 5. Reg to 1099
 6. Research/Sourcing
 7. Unmatched
 8. Unsolicited
- F. Define each of the value found in the field "Job Country Group":
1. 01
 2. 07
- G. Explain the difference between the fields "Original Hire Date", "Current Hire Date" and "Service Date".
- H. Explain the difference between the fields "Employee Position Start Date" and "Position Start Date".
- I. Explain the difference between the fields "Previous Employer" and "Company Name".
- J. In some observations, the value for "Current Job End Date" is "12/31/9999", which is not a valid date. What does this values stand for?
- K. In some observations, the value for "Pay End Date" is "12/31/9999", which is not a valid date. What does this values stand for?
- L. In some observations, the value for "Annual Review End Date" is "12/31/9999", which is not a valid date. What does this values stand for?
- M. In some observations, the value for "Appraise Date" is "01/01/1900" or "12/31/9999", which are not valid dates. What do these values stand for?

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- N. Close to 45% of the observations have missing values for "Previous Employer".
- a. Please explain why this would occur.
 - b. Does a missing value in the field "Previous Employer" mean that the employee has not previously worked at any other?
- O. Please provide the following additional fields:
1. Compensation at previous employer
 2. Education level and institution
 3. Bonus
 4. Benefits
 5. Stock option grants
 6. End of employment date
 7. Reason for leaving
 8. New employer
 9. Salary, bonus, benefits, and stock options at new employer
 10. Data regarding outside offers of particular employees (if any):
 - a) Name or unique application identifier of employee with offer
 - b) Date on which employee reports being approached
 - c) Manner approached (telephone call, email, etc.)
 - d) Date employee brings an offer to the company and asks for a response
 - e) Name of competing firm(s)
 - f) Position offered
 - g) Competitor compensation offered
 - h) Outcome (raise, no adjustment, left for another job, etc.)

II. Hiring and Recruiting Data

- A. No hiring and recruiting data have been produced to date. Please produce hiring and recruiting data as previously requested.